

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY MOGOROVIC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 22-cv-02494
)	
FED EX GROUND PACKAGE SYSTEM, INC.;)	
a/k/a FED EX GROUND; FED EX)	Hon.
FREIGHT, INC.; and FED EX CORPORATION.)	
)	
Defendants.)	

NOTICE OF REMOVAL

The Defendant, FEDERAL EXPRESS CORPORATION (“FedEx Express”) incorrectly named as “FedEx Corporation”, hereby removes to this Court, under 28 U.S.C. § 1441 and 28 U.S.C. § 1446, the state action described below:

1. On January 27, 2022, the Plaintiff, ANTHONY MOGOROVIC (“Mogorovic”), commenced an action in the Circuit Court of the 18th Judicial Circuit, DuPage County, Illinois, entitled *Anthony Mogorovic v. FedEx Ground Package System, Inc., a/k/a Fed Ex Ground, Fed Ex Freight, Inc., and Fed Ex Corporation*, case number 2022-L-000094. A copy of the Summons is attached as Exhibit A and a copy of the Complaint is attached as Exhibit B.

2. FedEx Express was served with a Summons and a copy of the Complaint on or about April 15, 2022. A copy of the Proof of Service is attached as Exhibit C.

3. Less than thirty days have elapsed since FedEx Express received a copy of Plaintiff’s Complaint.

4. This Court has original jurisdiction of this action under 28 U.S.C. § 1332 because this is a civil action between citizens of different states and the matter in controversy exceeds the

sum of \$75,000.00, exclusive of costs and interests; as such, this action may be removed to this Court by FedEx pursuant to 28 U.S.C. §1441.

i. Both Federal Express Corporation and FedEx Corporation (its corporate parent) are Delaware Corporations with each of their principal places of business in Tennessee; as such, they are citizens of both states, and were so at all relevant times.

ii. Mogorovic is not a citizen of either Delaware, or Tennessee; and was at all relevant times a citizen of Illinois.

iii. Mogorovic claims damages of a personal and pecuniary nature and seeks a judgment against defendants in “excess of \$50,000.00”. See Supreme Court Rule 222(b) Affidavit of the Complaint attached as Exhibit B.

5. The remaining defendants named in the original state court litigation are also completely diverse from the plaintiff. FEDEX FREIGHT, INC., is incorporated in Delaware, and its principal place of business is in Tennessee. FEDEX GROUND PACKAGE SERVICE, INC., is incorporated in Delaware, and its principal place of business is in Pennsylvania.

6. All defendants have consented to the filing of this Notice of Removal.

WHEREFORE, the Defendant, FEDERAL EXPRESS CORPORATION prays that this action be removed from the Circuit Court of Cook County, Illinois to the United States District Court for the Northern District of Illinois, Eastern Division.

FEDERAL EXPRESS CORPORATION and
FEDEX CORPORATION

By one of their Attorneys

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